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ABSTRACT

The General Accounting Office reviewed the eligibility requirements and annual operating cycles of 38 programs providing employment training (ET) assistance to economically disadvantaged, older, younger, and dislocated workers at a cost of $8.1 billion. The review confirmed that conflicting eligibility requirements and differences in annual operating cycles are hampering the ability of programs to provide participants with needed services. Recommendations called for standardizing all terms related to income definitions, standardizing the term "job loss," and developing standard income- and age-related eligibility criteria so as to facilitate coordination among agencies and between the different levels of government. (Appendixes constituting over 80% of this document include the following: a list of federal ET programs and their proposed FY94 funding levels by agency, statistics regarding the four target groups included in the analysis, eligibility standards for economically disadvantaged persons, age requirements in older worker programs, lower and upper age limits for youth programs, definitions of job loss among dislocated worker programs, programs' annual operating cycles, and a list of major contributors to this report.) (MN)

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ED 367 840

United States General Accounting Office

GAO

Report to the Chairman, Subcommittee on Employment and Productivity, Committee on Labor and Human Resources, U.S. Senate

January 1994

MULTIPLE EMPLOYMENT TRAINING PROGRAMS

Conflicting Requirements Hamper Delivery of Services

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United States
General Accounting Office
Washington, D.C. 20548

Health, Education, and
Human Services Division

B-253138

January 28, 1994

The Honorable Paul Simon, Chairman
Subcommittee on Employment and Productivity
Committee on Labor and Human Resources
United States Senate

Dear Mr. Chairman:

For many years, administrators and clients have struggled to navigate through the increasing multitude of federal employment training programs. Our analysis of the President's proposed fiscal year 1994 budget identified at least 154 programs[1] that provide about $25 billion in funding for employment training assistance for adults and out-of-school youth.[2] Many of the 154 programs provide similar or complementary services to the same target populations. To promote coordination among these programs, the Congress has required some agencies to jointly plan their activities, and, in some instances, has provided funding to facilitate coordination efforts. In addition, several states have taken steps to better coordinate service delivery at the local level. However, differences in program requirements often hamper efforts to coordinate the delivery of services to help people find jobs.

This report responds to your request that we identify how programs serving the same target populations differ concerning (1) eligibility requirements and (2) annual operating cycles.[3] Our review focused on 38 programs providing employment training assistance to four target groups—economically disadvantaged, older, younger, and dislocated workers—at a cost of $8.1 billion.[4] In our analysis of each program, we reviewed the statutes, regulations, and agency documents. We also held discussions with state and local administrators regarding program requirements.

[1]As used in this report, "employment training program" refers to those programs and related funding streams that provide assistance to adults and out-of-school youth that enhances individual skills or employment opportunities. Appendix I lists each of the 154 programs and their proposed funding for fiscal year 1994.

[2]Multiple Employment Programs: National Employment Training Strategy Needed (GAO/T-HRD-93-27, June 18, 1993).

[3]The original request asked that we also look at differences in performance measures; however, because of the limited number of programs with specific performance measure definitions, it was agreed that we would drop this issue from our analysis.

[4]Appendix II shows the 38 programs by target population and their proposed funding levels for fiscal year 1994.

In addition to this report, we are issuing another report concerning problems with the current fragmented "system" of multiple employment training programs. That report, Multiple Employment Training Programs: Overlapping Programs Can Add Unnecessary Administrative Costs (GAO/HEHS-94-80, Jan. 28, 1994), concerns the extent to which programs overlap in the populations they target, in the services they provide, and in the administrative structures they create to deliver those services. We also have other ongoing work that (1) concerns the extent to which federal agencies know whether their employment training programs are effective in helping participants compete in the workforce and (2) addresses the need for a major overhaul of the entire federal employment training system.

Background

In 1992, at least 9.4 million people of work age were unemployed during some part of the year. At the same time, others were trying to enter the workforce for the first time. While many of these people were successful at finding jobs, others had more difficulty. Among those groups with the highest unemployment were youth, with an unemployment rate almost three times the national average. On average, over 1.3 million youth between the ages of 16 and 19 were unemployed each month in 1992. Large numbers of economically disadvantaged workers also had difficulty finding jobs. Of the 4.8 million families on Aid to Families With Dependent Children (AFDC) each month, about 8 percent of the adults worked in 1992. Other groups, such as Native Americans, migrants, and older workers, also had a difficult time finding a job.

To help people from these groups find a place in the workforce, the federal government has created a variety of programs. Many of these programs target the same populations. Our work identified 10 groups that were the focus of most federal employment training programs—economically disadvantaged, older workers, youth, dislocated workers, Native Americans, refugees, migrants, the homeless, women and minorities, and veterans.

These programs often provide the same target population similar or complementary services in the same five basic areas: (1) counseling and assessment, (2) remedial education, (3) vocational skills training, (4) placement assistance, and (5) support services. To make the most of the limited resources available in each program, it is important that these programs work together as they deliver services at the local level.

Results in Brief

Conflicting eligibility requirements and differences in annual operating cycles are hampering the ability of programs to provide participants needed services. Despite decades of efforts to better coordinate employment training programs, conflicting requirements continue to make it difficult for program staff to coordinate activities and share resources. One state administrator stated the problem especially clearly: "The aim of case management is to access various programs in order to deliver the best services possible to clients. However, conflicting requirements turn coordination into a jigsaw puzzle...."

Differences in eligibility criteria make determining who is eligible for which program a complex process that confuses clients and frustrates administrators. For example, the nine programs targeting the economically disadvantaged use several different standards for measuring income level, for defining family or household, and for defining what is included in income. Programs targeting older workers create confusion because they use differing age requirements to define "older worker." Programs targeting youth differ in age criteria at both the lower age limit and the upper age limit. Dislocated worker programs differ in their criteria for what constitutes an eligible "job loss" such as in the recognition of pending layoff notices, definitions of dates of employment, voluntary separations, and reduced hours or wages.

Within each target group, differences in annual operating cycles also hamper the ability of program administrators to plan together to ensure that participants receive the services they need. For example, the 16 programs that target youth have four different operating cycles. Some programs serving the same target population will have completed their planning process and begun operation on January 1, while other programs will not complete their planning until the following July. As a result, administrators may not be able to coordinate their plans to ensure that the resources needed to serve their clients are available.

Differences in Eligibility Criteria Hamper Delivery of Services

Reconciling definitions for eligibility among programs attempting to serve the same target populations can help programs share resources and coordinate activities. However, we found significant differences in the eligibility criteria in each of the four target groups we analyzed. For example, not all programs targeting the economically disadvantaged used the same definition of "economically disadvantaged." We found that six different standards were used for defining income eligibility levels, five for defining family or household, and five for defining what is included in

income. As a result, a member of a family of four with an income of $20,040 would be considered "disadvantaged" and eligible for services from one program, but the same $20,040 income exceeds another program's definition of "disadvantaged," making the family member ineligible for services from that program. With the need for programs to be able to share resources to meet all their clients' needs, this could mean that some clients may not be able to obtain needed services. See appendix III for more information on the different standards used in each of the programs that targeted the economically disadvantaged.

Given the confusion created by the differing eligibility requirements, it is not surprising that a recent survey of state and local administrators showed that administrators frequently recommended standardizing the term "economically disadvantaged." Most of those surveyed wanted to standardize all terms related to income definitions, such as what constitutes family income or personal income, how to establish ownership of resources, and what is included in income disregards. One benefit that the administrators felt could be achieved by developing standard definitions and criteria was that the same intake form could be used across programs, which would facilitate coordination efforts and improve service delivery.[5]

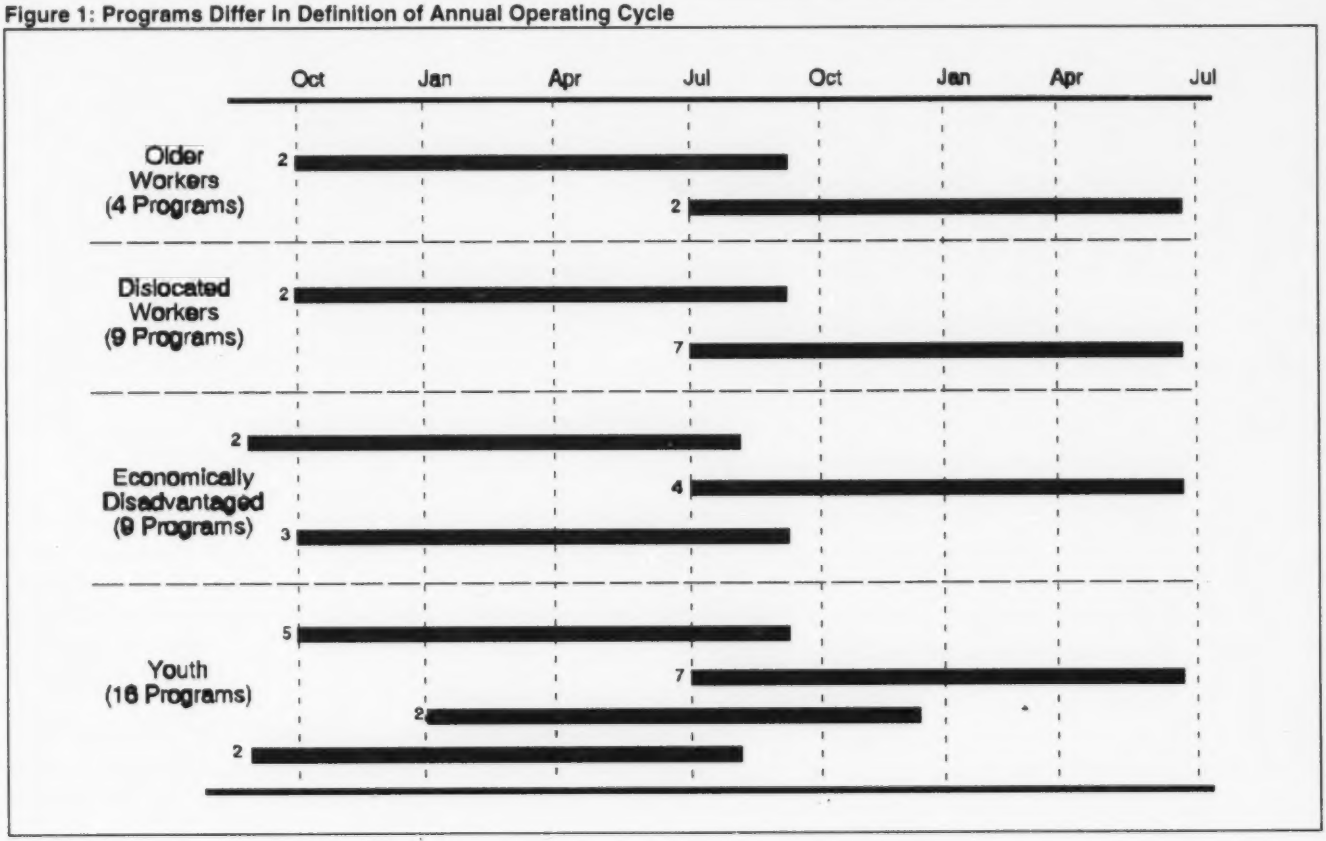
Income criteria are not the only eligibility concern. Programs targeting older workers differ in how they define "older worker." Some used a minimum age of 55 years, while others used a minimum of 60 years. Programs targeting youth also differ in their age limits. Lower age limits for youth programs ranged from 11 to 16 years of age, while upper age limits ranged from 19 to 27. See appendixes IV and V, respectively, for more information on the age criteria used by older worker programs and youth programs. As mentioned earlier, dislocated worker programs differ in their criteria for what constitutes an eligible "job loss." See appendix VI for more information on each program's definition of what constitutes a job loss. These differences, according to state and local administrators, not only make it difficult for case managers to determine eligibility of clients, but clients themselves feel confused and discriminated against.

[5]Streamlining and Integrating Human Resource Development Services for Adults, National Governors' Association, Training and Employment Program (Center for Policy Research, 1991).

Differences in Operating Cycles Also Hamper Coordination

Differences in program operating cycles also make it difficult for administrators attempting to coordinate their programs through joint planning. Matching available funding with estimates of the number of those seeking assistance is more complex, if not impossible, when operating cycles do not match. However, as shown in figure 1, we found that programs within each of the four target groups operate on different annual cycles. Most programs (20) operated on the basis of a program year (July 1-June 30); 12 programs operated on the federal fiscal year (October 1-September 30); 4 programs operated on an academic year (September 1-August 31); and 2 programs operated on a calendar year (January 1-December 31). See appendix VII for more information on the operating cycles for each program in our analysis.

Figure 1: Programs Differ in Definition of Annual Operating Cycle



This problem is compounded for program administrators who need to integrate program operating cycles into state and local operating time frames. One state administrator, for example, indicated that his state operates on a September to August time frame, while some federal programs operate on the federal fiscal year (October 1 to September 30), and others operate on a program year (July 1 to June 30).

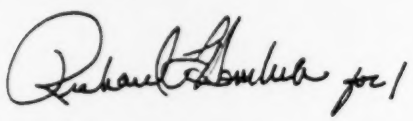
To accomplish joint planning, agencies must resort to several circuitous strategies. According to local administrators, some officials set low estimates of the number of clients from other programs they can serve or others only commit resources they know will be available but contribute additional resources if they become available at a later time. Other agencies make such commitments contingent on expected funding so they are not held to prior commitments when their expected funding levels are not realized. Unfortunately, these methods can result in the underutilization of available resources or crisis planning when resources are available.

Conclusion

Programs are increasingly being directed to coordinate activities and share resources to ensure that anyone who needs help can get it. Nevertheless, program administrators, as well as those people needing employment training assistance, continue to face a fragmented "system" of categorical programs characterized by differences in eligibility requirements and annual operating cycles. Differences in eligibility criteria and operating cycles among programs serving the same target populations act as barriers to coordinating program services and impede the effective delivery of needed services and the efficient use of program resources. As a result, people in need of employment training assistance may not have access to the services they need to help them find jobs.

Our work was conducted between April and September 1993 in accordance with generally accepted government auditing standards. As you requested, agency comments on this report were not obtained, but copies will be sent to those involved and other interested parties. Should you have any questions or wish to discuss the information provided, please call me at (202) 512-7014. Other major contributors are listed in appendix VIII.

Sincerely yours,



Linda G. Morra
Director, Education
and Employment Issues

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Abbreviations

AFDC	Aid to Families With Dependent Children
EDWAA	Economic Dislocation and Worker Adjustment Assistance
IRS	Internal Revenue Service
JOBS	Job Opportunities and Basic Skills Training
JTPA	Job Training Partnership Act
OPM	Office of Personnel Management
LLSIL	Lower Living Standard Income Level
SCSEP	Senior Community Service Employment Program
SSI	Supplemental Security Income
TAA	Trade Adjustment Assistance
UI	Unemployment Insurance

Appendix I

Federal Employment and Training Programs Proposed Funding Levels by Agency (Fiscal Year 1994)[a]

Dollars in millions

Agency and programs	Fiscal year 1994[b]
All programs (154)	**Total: $24,837.7**
Action - (3) programs	**Total: 100.9**
Literacy Corps	5.3
Foster Grandparent Program	66.4[c]
Senior Companion Program	29.2[c]
Department of Agriculture - (1) program	**Total: 162.7**
Food Stamp Employment & Training	162.7[c]
Appalachian Regional Commission - (1) program	**Total: 11.2**
Appalachian Vocational and Other Education Facilities and Operations	11.2
Department of Commerce - (9) programs	**Total: 220.5**
Minority Business Development Centers	24.4
American Indian Program	1.9
Economic Development-Grants for Public Works and Development	135.4
Economic Development-Public Works Impact Program	[d]
Economic Development-Support for Planning Organizations	24.8
Economic Development-Technical Assistance	10.4
Economic Development-State and Local Economic Development Planning	4.5
Special Economic Development and Adjustment Assistance Program-Sudden and Severe Economic Dislocation and Long-Term Economic Deterioration	19.1
Community Economic Adjustment	[e]
Department of Defense - (2) programs	**Total: 72.8**
Military Base Reuse Studies and Community Planning Assistance	6.0
Transition Assistance Program	66.8[c]
Department of Education - (60) programs	**Total: 13,031.4**
Even Start-State Educational Agencies	88.8
Even Start-Migrant Education	2.7
Women's Educational Equity	2.0
Indian Education-Adult Education	4.9
Migrant Education-High School Equivalency Program	8.1
Migrant Education-College Assistance Migrant Program	2.3
School Dropout Demonstration Assistance	37.7[c]
Adult Education-State Administered Basic Grant Program	261.5
Adult Education for the Homeless	10.0
National Adult Education Discretionary Program	9.3
Vocational Education-Demonstration Projects for the Integration of Vocational and Academic Learning	[f]
Vocational Education-Educational Programs for Federal Correctional Institutions	[f]
Vocational Education-Comprehensive Career Guidance and Counseling	[f]

(continued)

Appendix I
Federal Employment and Training Programs Proposed Funding Levels by Agency (Fiscal Year 1994)[a]

Dollars in millions

Agency and programs	Fiscal year 1994[b]
Vocational Education-Blue Ribbon Vocational Educational Programs	[f]
Vocational Education-Model Programs for Regional Training for Skilled Trades	[f]
Vocational Education-Business/Education/Labor Partnerships	[f]
Vocational Education-Tribally Controlled Postsecondary Vocational Institutions	2.9
Vocational Education-Tribal Economic Development	[f]
Vocational Education-Basic State Programs	717.5[c]
Vocational Education-State Programs and Activities	81.3
Vocational Education-Single Parents, Displaced Homemakers, and Single Pregnant Women	69.4
Vocational Education for Sex Equity	31.1
Vocational Education-Programs for Criminal Offenders	9.6
Vocational Education-Cooperative Demonstration	[f]
Vocational Education-Indian and Hawaiian Natives	15.1
Vocational Education-Opportunities for Indians and Alaskan Natives	[f]
Vocational Education-Community Based Organizations	11.8[c]
Vocational Education-Bilingual Vocational Training	0.0
Vocational Education-Demonstration Centers for the Training of Dislocated Workers	[c,f]
Vocational Education-Consumer and Homemaking Education	0.0
Vocational Education-TechPrep Education	104.1
National Workplace Literacy Program	22.0
English Literacy Program	0.0
Literacy for Incarcerated Adults	5.1
National Center for Deaf-Blind Youth and Adults	6.7
State Literacy Resource Centers	7.9
Student Literacy Corps	6.1[c]
Federal Pell Grant Program[g]	2,846.9
Guaranteed Student Loans[g]	5,889.0
Federal Supplemental Education Opportunity Grants[g]	125.0
Upward Bound	160.5[c]
Talent Search	67.0[c]
Federal Work Study Program[g]	89.6
Federal Perkins Loan Program-Federal Capital Contributions[g]	13.0
Grants to States for State Student Incentives	0.0
Educational Opportunity Centers	23.3[c]
Higher Education-Veterans Education Outreach Program	3.1
Student Support Services	110.3
Postsecondary Education Programs for Persons with Disabilities	8.8
Rehabilitation Services Basic Support-Grants to States	1,933.4
Rehabilitation Services Basic Support-Grants for Indians	6.4

(continued)

Appendix I
Federal Employment and Training Programs Proposed Funding Levels by Agency (Fiscal Year 1994)[a]

Dollars in millions

Agency and programs	Fiscal year 1994[b]
Rehabilitation Services Service Projects-Handicapped Migratory and Seasonal Farm Workers	1.2
Rehabilitation Services Service Projects-Special Projects and Demonstrations for Providing Vocational Rehabilitation Services to Individuals With Severe Disabilities	19.9
Rehabilitation Services Service Projects-Supported Employment	10.6
Projects With Industry Programs	21.6
Supported Employment Services for Individuals with Severe Handicaps	33.1
Comprehensive Services for Independent Living	15.8
Library Literacy	0.0
School to Work[h]	135.0[c]
Public Library Services	[f]
Department of Health and Human Services - (14) programs	**Total: 2,203.5**
Job Opportunities and Basic Skills Program	825.0[c]
Community Services Block Grant	352.7
Community Services Block Grant- Discretionary Award	39.7
Community Services Block Grant Discretionary Awards-Demonstration Partnership	4.4
Refugee and Entrant Assistance-Discretionary Grants	12.6
Refugee and Entrant Assistance-State Administered Programs	84.4
Refugee and Entrant Assistance-Voluntary Agency Programs	39.9
Community Demonstration Grant Projects for Alcohol and Drug Abuse Treatment of Homeless Individuals	[f]
Family Support Centers Demonstration Program	6.9
State Legalization Impact Assistance Grants	809.9
Transitional Living for Runaway and Homeless Youth	11.8[c]
Independent Living	16.2[c]
Scholarships for Health Professions Students From Disadvantaged Backgrounds	[f]
Health Careers Opportunity Program	[f]
Department of Housing and Urban Development - (4) programs	**Total: 303.4**
Emergency Shelter Grants Program	51.4
Supportive Housing Demonstration Program	164.0
Youthbuild[h]	88.0[c]
Family Self-Sufficiency Program	[c,i]
Department of the Interior - (2) programs	**Total: 20.9**
Indian Employment Assistance	16.9
Indian Grants-Economic Development	4.0
Department of Labor - (36) programs	**Total: 7,141.5**
JTPA IIA Training Services for the Disadvantaged-Adult	793.1[c]
JTPA IIA State Education Programs	82.4[c]
JTPA IIA Incentive Grants	51.5[c]
JTPA IIA Training Programs for Older Individuals	51.5[c]

(continued)

Appendix I
Federal Employment and Training Programs Proposed Funding Levels by Agency (Fiscal Year 1994)[a]

Dollars in millions

Agency and programs	Fiscal year 1994[b]
JTPA IIC Disadvantaged Youth	563.1[c]
JTPA IIC Disadvantaged Youth-Incentive Grants	34.3[c]
JTPA IIC Disadvantaged Youth-State Education Programs	54.9[c]
JTPA IIB Training Services for the Disadvantaged-Summer Youth Employment and Training Program (Regular)	1,688.8[c]
JTPA IIB Summer Youth Employment and Training Program (Native American)	[b,k]
JTPA EDWAA-Dislocated Workers (Local SDA Allotment)[k]	229.5[c]
JTPA EDWAA-Dislocated Workers (Governor's 50% Discretionary)[k]	229.5[c]
JTPA EDWAA-Dislocated Workers (Secretary 20% Discretionary)[k]	114.7[c]
JTPA Defense Conversion Adjustment Program	[c,m]
JTPA Defense Diversification	[c,n]
JTPA Clean Air Employment Transition Assistance	[c,o]
JTPA-Migrant and Seasonal Farmworkers	78.3
JTPA-Employment and Training Research and Development Projects	11.2
JTPA Employment Services and Job Training-Pilot and Demonstration Programs	35.1
JTPA-Native American Employment and Training Programs	61.9
JTPA Job Corps	1,153.7[c]
Federal Bonding Program	0.2
Senior Community Service Employment Program	421.1[c]
Apprenticeship Training	17.2
Trade Adjustment Assistance-Workers	215.0[c]
Targeted Jobs Tax Credit	19.2
Employment Service-Wagner Peyser State Grants (7a)	734.8
Employment Service-Wagner Peyser Governor's Discretionary Funds (7b)	81.6
Labor Certification for Alien Workers	58.6
Interstate Job Bank	1.9
Youth Fair Chance[l]	25.0[c]
One-Stop Career Centers[l]	150.0
Veterans Employment Program	9.0
Disabled Veterans Outreach Program	84.0
Local Veterans Employment Representative Program	77.9
Homeless Veterans Reintegration Project	[f]
Job Training for the Homeless Demonstration Project	12.5
Office of Personnel Management - (1) program	**Total: [q]**
Federal Employment for Disadvantaged Youth-Summer	[c,c]
Small Business Administration - (8) programs	**Total: 157.4**
Management and Technical Assistance for Socially and Economically Disadvantaged Businesses	8.1
Small Business Development Center	67.0

(continued)

Dollars in millions

Agency and programs	Fiscal year 1994[b]
Women's Business Ownership Assistance	1.5
Veteran Entrepreneurial Training and Counseling	0.4
Service Corps of Retired Executives Association	3.1
Business Development Assistance to Small Business	20.9
Procurement Assistance to Small Business	33.7
Minority Business Development	22.7
Department of Transportation - (1) program	**Total: 1.5**
Human Resource Programs	1.5
Department of Veterans Affairs - (12) programs	**Total: 1,410.0**
All-Volunteer Force Educational Assistance	895.1
Selected Reserve Educational Assistance Program	[f]
Survivors and Dependents Educational Assistance	109.1
Vocational Rehabilitation for Disabled Veterans	245.1
Post-Vietnam Era Veterans Educational Assistance	42.4
Hostage Relief Act Program	[g]
Vocational Training for Certain Veterans Receiving VA Pension	[f]
Vocational and Educational Counseling for Servicemembers and Veterans	[f]
Service Members Occupational Conversion and Training	64.5
Health Care for Homeless Veterans	28.3
Domiciliary Care for Homeless Veterans	23.4
Housing and Urban Development/Veterans Affairs-Supported Housing	2.1

[a]Programs identified are federally funded and designed to (1) assist the unemployed, (2) create employment, and (3) enhance employability. The programs provide assistance to adults and out-of-school youth not enrolled in advanced-degree programs.

[b]The proposed fiscal year 1994 funding amounts shown in appendix I are based primarily on the President's proposed budget dated April 8, 1993. In some instances, the amount shown may have been adjusted to reflect only that portion of the program that provided assistance to adults and out-of-school youth; however, in other instances the amount shown is for the entire program even though only a portion of the program funding may go to providing employment training assistance as defined in this report.

[c]Program included in analysis.

[d]Economic Development-Public Works Impact: program funds included in Grants for Public Works and Development Facilities.

[e]Community Economic Adjustment: funds allocated in 1993 are used to support programs in out years until funding is depleted.

[f]Data not available at this time.

[g]Education loan program: amounts shown are estimates of loans for associate and nondegree programs, when possible to differentiate.

[h]School to Work: program proposed for fiscal year 1994. Funded at $270.0 million split evenly between the Departments of Education and Labor. Department of Education funding is from Carl Perkins Act: $15 million from National Programs-Research and Development and $120 million from Cooperative Demonstrations Program. Department of Labor funding is from the Job Training Partnership Act (JTPA).

[i]Youthbuild: program proposed for fiscal year 1994.

[j]Family Self-Sufficiency Program: job training, education, and support services are paid for by other programs such as Job Opportunities and Basic Skills Training (JOBS) and JTPA. Federal funds may be used to cover local administrative costs. For fiscal year 1993, appropriations for operating subsidies permit the payment of $25.9 million to cover the administrative costs of operating the Family Self-Sufficiency program.

[k]The actual funding for the JPTA Title III EDWAA program was increased significantly from the budget request dated April 8, 1993. The proposed funding for substate areas of $229.5 million was increased to $537 million. The proposed funding for the EDWAA Governor's Discretionary funds were also $229.5 million but was increased to $357 million. Similarly, the Secretary's Discretionary funds were increased from $114.7 million to $223 million.

[l]JTPA IIB Summer Youth Employment and Training Program (Native American): funding included in JTPA IIB (Regular) program total.

[m]JTPA Defense Conversion Adjustment Program: funds allocated in 1991 used to support programs in out years until funding is depleted.

[n]JTPA Defense Diversification: funds allocated in 1993 used to support programs in out years until funding is depleted.

[o]JTPA Clean Air Employment Transition Assistance: no funds were appropriated for the Clean Air Act in fiscal year 1994.

[p]New program in 1994.

[q]Federal Employment for Disadvantaged Youth-Summer: program coordinated by Office of Personnel Management (OPM), but carried out by numerous federal agencies. Obligations devoted to administration not separately identifiable.

[r]Selected Reserve Educational Assistance Program: funding included in All-Volunteer Force Educational Assistance total.

[s]Hostage Relief Act Program: replaced by the Omnibus Diplomatic Security and Anti-Terrorist Act of 1986. No program funding used in any year, but available.

[t]Vocational and Educational Counseling for Servicemembers and Veterans: program funds included in other veterans programs, such as the All-Volunteer Force Educational Assistance Program.

Four Target Groups Included in Analysis

Target group	Program	Fiscal year 1994 proposed funding (in millions)
Economically Disadvantaged	JTPA IIA Training Services for the Disadvantaged-Adult	$ 793.1
	JTPA IIA State Education Programs	82.4
	JTPA IIA Incentive Grants	51.5
	Job Opportunities and Basic Skills Training	825.0
	Food Stamp Employment and Training	162.7
	Family Self-Sufficiency Program	[a]
	Vocational Education-Basic State Programs	717.5
	Educational Opportunity Centers	23.3
	Student Literacy Corps	6.1
	Subtotal	**2,661.6**
Older Workers	Senior Community Service Employment Program	421.1
	JTPA IIA Training Program for Older Individuals	51.5
	Foster Grandparent Program	66.4
	Senior Companion Program	29.2
	Subtotal	**568.2**
Youth	JTPA IIC Disadvantaged Youth	563.1
	JTPA IIC Disadvantaged Youth - Incentive Grants	34.3
	JTPA IIC Disadvantaged Youth - State Education Programs	54.9
	JTPA IIB Training Services for the Disadvantaged-Summer Youth Employment and Training Program (Regular)	1,688.8
	JTPA IIB Summer Youth Employment and Training Program (Native American)	[b]
	JTPA Job Corps	1,153.7
	Youth Fair Chance	25.0
	Transitional Living for Runaway and Homeless Youth	11.8
	Independent Living	16.2
	School Dropout Demonstration Assistance	37.7
	Vocational Education-Community Based Organizations	11.8
	Upward Bound	160.5
	Talent Search	67.0
	School to Work	135.0
	Federal Employment for Disadvantaged Youth-Summer	[c]
	Youthbuild	88.0
	Subtotal	**4,047.8**
Dislocated Workers	JTPA EDWAA-Dislocated Workers (Local SDA Allotment)	229.5
	JTPA EDWAA-Dislocated Workers (Governor's 50% Discretionary)	229.5
	JTPA EDWAA-Dislocated Workers (Secretary's 20% Discretionary)	114.7

(continued)

Target group	Program	Fiscal year 1994 proposed funding (in millions)
	JTPA Defense Conversion Adjustment Program	[d]
	JTPA Clean Air Employment Transition Assistance	[e]
	JTPA Defense Diversification	[f]
	Trade Adjustment Assistance-Workers	215.0
	Vocational Education-Demonstration Centers for the Retraining of Dislocated Workers	[g]
	Transition Assistance Program	66.8
	Subtotal	**855.5**
Total for Target Groups Analyzed		**$8,133.1**

[a]Family Self-Sufficiency Program: job training, education, and support services are paid for by other programs such as JOBS and JTPA. Federal funds may be used to cover local administrative costs. For fiscal year 1993, appropriations for operating subsidies permit the payment of $25.9 million to cover the administrative costs of operating the Family Self-Sufficiency program.

JTPA IIB Summer Youth Employment and Training Program (Native American): funding included in JTPA IIB (Regular) program total.

[c]Federal Employment for Disadvantaged Youth-Summer: program coordinated by OPM, but carried out by numerous federal agencies. Obligations devoted to administration not separately identifiable.

[d]JTPA Defense Conversion Adjustment Program: funds allocated in 1991 used to support programs in out years until funding is depleted.

[e]JTPA Clean Air Employment Transition Assistance: funds allocated in 1993 used to support programs in out years until funding is depleted.

[f]JTPA Defense Diversification: funds allocated in 1993 used to support programs in out years until funding is depleted.

[g]Data not available at this time.

Eligibility Standards for the Economically Disadvantaged

In reviewing the factors generally used to determine eligibility, we found that the nine programs that specifically target the economically disadvantaged used six different measures of income level, five definitions of family or household, and five definitions of income. The large array of eligibility criteria makes implementation difficult for state administrators as well as for those seeking assistance.

As shown in table III.1, the standards used to measure low income included the official poverty income guidelines, some multiple of those guidelines (such as 130 or 150 percent), and area median family income. Two programs illustrate the differences that can result from using a variety of measures. A member of a family of four with an income of up to $20,040 would be considered "disadvantaged" and eligible for services from the Educational Opportunity Centers. This program uses the income measure of 150 percent of the Bureau of Census poverty level. However, for this same family member to be eligible for the Food Stamp Employment and Training Program, income could not exceed $17,420 because this program uses the measure of 130 percent of the official poverty guidelines. Some programs use two measures. For example, JTPA programs use the higher of the official poverty measure or 70 percent of the regionally adjusted Lower Living Standard Income Level (LLSIL). In the above example, this would have been the LLSIL, which was higher in the metropolitan Northeast, $16,360, compared with $13,400 for the official poverty measure.

Table III.1: Different Standards for Measuring Income Used by Programs Targeting Economically Disadvantaged

	Income does not exceed...					
	HHS Official Poverty Guidelines		Lower Living Standard Income Level	Area Median Family Income	Bureau of Census Poverty Threshold	
Program	100%	130%	70%		100%	150%
JTPA IIA Disadvantaged Adults	X[a]		X			
JTPA IIA State Education Programs	X		X			
JTPA IIA Incentive Grants	X		X			
Job Opportunities and Basic Skills[b]						
Food Stamp Employment and Training	X[c]	X				
Family Self-Sufficiency Program				X[d]		
Educational Opportunity Centers						X
Vocational Education-Basic State Programs	X[e]				X	
Student Literacy Corps[f]						

[a]JTPA programs base eligibility on whichever is higher, the official poverty guidelines or 70 percent of the regionally adjusted Lower Living Standard Income Level.

[b]Eligibility varies by state because of differences in state criteria for AFDC eligibility.

[c]Uses three measures: (1) household income after exclusions and deductions as defined by the Gross Income Standard for households that include an elderly or disabled member or (2) household income after exclusions but before deductions for households that do not include an elderly or disabled member or (3) gross income not to exceed 130 percent of the official poverty guidelines for households that do not include an elderly or disabled member.

[d]Uses two measures: "Low-income" does not exceed 80 percent of area's median income while "very low income" does not exceed 50 percent of the area's median income.

[e]This program allows educational institutions to use several low-income measures as well as "other indices of economic status" with the approval of the Department of Education.

[f]While program is targeted to the economically disadvantaged, the program requirements do not include a specific definition of income or related financial eligibility information.

Program eligibility and coverage also depends on whose income is counted in the eligibility calculation. We found five different criteria for family or household. As shown in table III.2, for example, JTPA considers the income of the family—all persons related by blood, marriage, or court decree—in determining eligibility. In contrast, the Food Stamp Program considers the income of the household, all those who purchase and cook food together.

Table III.2: Different Standards for Defining a Family or Household Used by Programs Targeting Economically Disadvantaged

	Family or household assistance unit includes...				
Program	Persons related by blood, marriage, or court decree	Unrelated dependents of head of household	Other unrelated persons if needed by child	Those who purchase & cook food together	Unrelated if elderly also present
JTPA IIA Training Services for the Disadvantaged-Adult	X				
JTPA IIA State Education Programs	X				
JTPA IIA Incentive Grants	X				
Job Opportunities and Basic Skills Training			X		
Food Stamp Employment and Training				X	
Family Self-Sufficiency Program					X
Educational Opportunity Centers		X			
Vocational Education-Basic State Programs[a]					
Student Literacy Corps[b]					

[a]Complex family or household assistance unit definitions, which can vary by state.

[b]Family or household not defined.

Programs also differ in their definition of what constitutes income. We identified five definitions of income, each with its own set of deductions and exclusions (see table III.3). For example, the JTPA programs include all earned income, but exclude unemployment insurance. The Food Stamp Employment and Training program includes unemployment insurance, but excludes 20 percent of all earned income. It is evident in some instances that exclusions are driven by the program's purpose, such as encouraging the participant to seek employment. While excluding some portion of earned income may provide an incentive to work, state and local administrators indicated that these differences not only confuse administrators and clients, but they can result in situations where economically disadvantaged workers may not receive needed services because the different eligibility criteria exclude them from the program that provides the services they need.

Table III.3: Income Definitions for Programs Targeting the Economically Disadvantaged

	Differences in income criteria				
Program	**Income excludes UI**	**Uses IRS taxable income including capital gains**	**Includes all earned income**	**Excludes 20% of earned income**	**Excludes $30 + one-third of earned income first 4 months**
JTPA IIA Training Services for the Disadvantaged-Adult	X		X		
JTPA IIA State Education Programs	X		X		
JTPA IIA Incentive Grants	X		X		
Job Opportunities and Basic Skills Training					X
Food Stamp Employment and Training				X	
Family Self-Sufficiency Program			X		
Educational Opportunity Centers		X	X		
Vocational Education-Basic State Programs[a]					
Student Literacy Corps[b]					

[a]Excluded from analysis due to wide latitude that states can exercise in determining income.

[b]Program requirements do not include a technical definition of income.

Differences in income definitions are further magnified by income exclusions that can vary from state to state. These rules produce a range of state income eligibility limits. For example, in the Foster Grandparent Program and Senior Companion Program, income levels cannot exceed 125 percent of the poverty guidelines or 100 percent of the poverty guidelines plus any Supplemental Security Income (SSI) provided by the state. As a result, a senior in one state receiving an SSI state supplement may be eligible for the program with income that exceeds 125 percent of the poverty level, while a senior in another state that does not provide SSI would be excluded if income exceeds 125 percent of the poverty level.

Some programs allow automatic eligibility to participants enrolled in another program. This tends to soften the effect of some of the above differences. However, minor differences exist within cross-eligibility definitions that can also create coordination barriers. For example, a person receiving food stamps is automatically eligible for the JTPA program. However, some people may choose not to participate in the Food Stamp program. It has been reported that only 59 percent of persons eligible for food stamps actually received them in 1989.[1] A report by the

[1]Time for a Change, Welfare Simplification and Coordination Advisory Committee Report (June 1993).

National Commission for Employment Policy[2] concluded that since many Hispanic families are clustered around JTPA's income cut-off point and choose not to participate in the Food Stamp program, many economically disadvantaged Hispanics are ineligible for needed JTPA training services. To resolve this problem, this report recommended that "receipt of Food Stamps," as an eligibility requirement, should be removed from the law and replaced with "eligible for Food Stamps."

[2]Training Hispanics: Implications for the JTPA System, National Commission for Employment Policy Report (Jan. 1990).

Age Requirements in Older Worker Programs

The four programs that target older workers vary in their minimum age requirements. As shown in table IV.1, two programs had a minimum age requirement of 55, although one program gave priority to those aged 60. The other two programs had a minimum age requirement of 60. These relatively minor age differences may result in some older workers under 60 years of age being excluded from needed program services.

Table IV.1: Older Worker Programs Differ in Age Requirements

	Minimum age required for admission	
Program name	**Age 55**	**Age 60**
JTPA Older Worker	X	
Senior Community Service Employment	X[a]	
Foster Grandparent		X
Senior Companion		X

[a]Priority is given to applicants 60 years of age.

Although the revised JTPA program amendments and the Older Americans Act, which authorizes the Senior Community Service Employment Program (SCSEP), call for increased coordination, these programs are prime examples of the difficulties that can arise when programs provide complementary services, but their eligibility requirements are not compatible. The SCSEP may be used to help older people, such as displaced homemakers,[1] gain work experience while JTPA finances skills training. Both the JTPA and the SCSEP define an "older worker" as one 55 years of age or older. However, SCSEP may exclude some older workers because it gives service priority to those applicants 60 years of age and older.

Even those seniors who meet the age criteria may sometimes be excluded because of additional differences in requirements related to economic status. Under JTPA, clients' incomes must be no more than 100 percent of the poverty guidelines or 70 percent of the lower living standard income level, but SCSEP allows participants to have incomes that are up to 125 percent of the poverty guidelines. Although JTPA does allow administrators to waive the income guidelines for 10 percent of participants, these workers must also face serious barriers to employment. According to a local program administrator, where these programs are located within the same building, clients are frequently referred from SCSEP to JTPA, but do not qualify under the latter program's more stringent

[1]An individual who was a full-time homemaker for a substantial number of years and derived the substantial share of his or her support from a spouse and no longer receives such support.

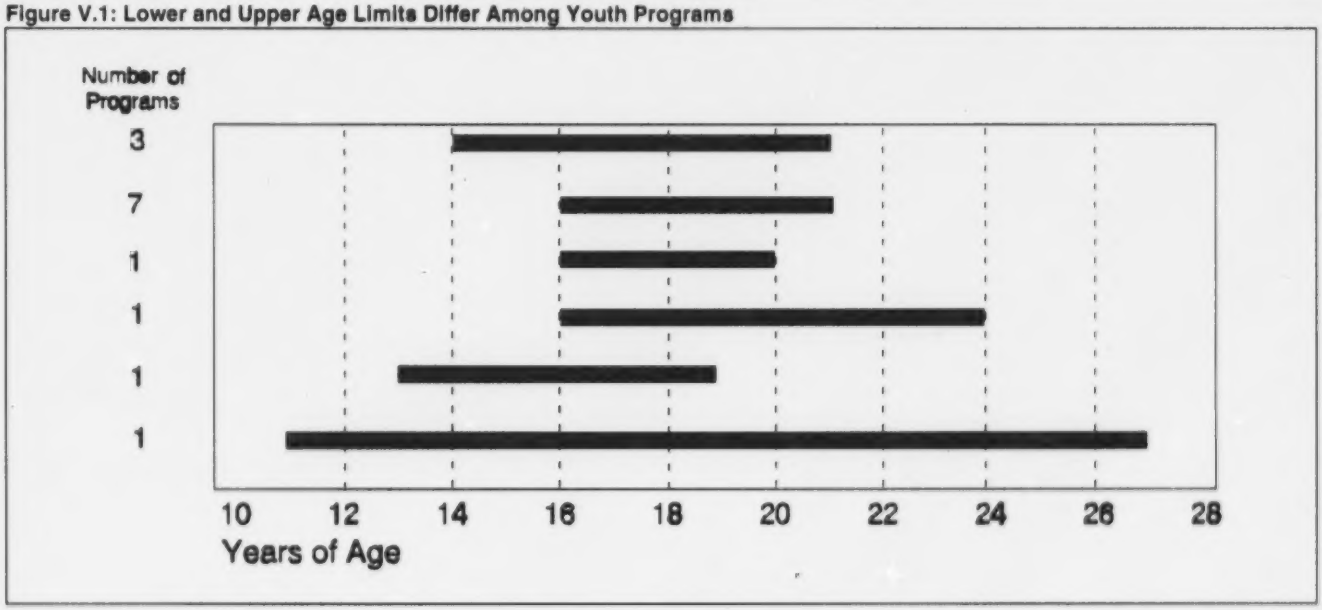
income criteria. In these instances, not only is it difficult for case managers to track client eligibility, but clients themselves feel confused and discriminated against.

In addition, program eligibility may vary from state to state. SCSEP includes Social Security as part of countable income, but for the JTPA Older Worker Program, each state has the choice of including or excluding Social Security income.

Lower and Upper Age Limits for Youth Programs

Programs targeting youth vary in eligibility requirements because of differences in their lower and upper age limits. As shown in figure V.1, lower age limits ranged from 11 to 16 years of age, while upper age limits ranged from 19 to 27.

Figure V.1: Lower and Upper Age Limits Differ Among Youth Programs



These differences in age criteria may result in youth being denied access to some programs. For example, as shown in table V.1, the JTPA Disadvantaged Summer Youth Program and the Federal Employment for Disadvantaged Youth both create summer employment for disadvantaged youth. Although both allow youth up to 21 years of age to participate, the programs had different requirements regarding lower age limits. Under the Federal Employment for Disadvantaged Youth, administered by the Office of Personnel Management (OPM), youth under the age of 16 are excluded from the program. However, the JTPA summer program, administered by the Department of Labor, permits youth to enroll in the program at 14 years of age.

Table V.1: Lower and Upper Age Limits for Youth Programs

Program	Lower and upper age limits					
	11 –27	13 –19	14 –21	16 –20	16 –21	16 –24
JTPA IIC Disadvantaged Youth					X	
JTPA IIC Disadvantaged Youth-Incentive Grants					X	
JTPA IIC Disadvantaged Youth-State Education Programs					X	
JTPA IIB Summer Youth Employment and Training Program (Regular)			X			
JTPA IIB Summer Youth Employment and Training Program (Native American)			X			
JTPA Job Corps					X	
Youth Fair Chance			X			
Transitional Living for Runaway and Homeless Youth					X	
Independent Living				X		
School Dropout Demonstration Assistance[a]						
Vocational Education-Community Based Organizations					X	
Upward Bound		X				
Talent Search	X					
School to Work[b]						
Federal Employment for Disadvantaged Youth-Summer					X	
Youthbuild						X

[a]Program requirements include a minimum age of 16, but no upper age limit.

[b]Program is proposed in fiscal year 1994 budget.

Definitions of Job Loss Among Dislocated Worker Programs

Nine separate dislocated worker[1] programs have been established to ensure that workers adversely affected by special circumstances, such as increased imports or defense downsizing, have access to reemployment assistance. Although all programs commonly target those workers who are dislocated, as shown in table VI.1, programs vary in their definitions of what constitutes "job loss." These differences may result in workers being denied access to program services.

Table VI.1: Definitions of Job Loss Among Dislocated Worker Programs

Program	Notice of layoff accepted	Date of hire/layoff restricted	Reduced hours and wages accepted	Voluntary separation accepted
JTPA-EDWAA-Dislocated Workers (Local SDA Allotment)	X			
JTPA-EDWAA-Dislocated Workers (Governor's 50% Discretionary)	X			
JTPA-EDWAA-Dislocated Workers (Secretary's 20% Discretionary)	X			
JTPA Defense Conversion Adjustment Program	X			
JTPA Clean Air Employment Transition Assistance	X			
JTPA Defense Diversification	X	X		X
Trade Adjustment Assistance-Workers		X	X	
Vocational Education-Demonstration Centers for the Retraining of Dislocated Workers[a]				
Transition Assistance Program	X	X		

[a]This program does not have a specific definition for dislocated workers.

Although most dislocated worker programs accepted a layoff or termination notice as proof of job loss and eligibility for services, three programs restricted access depending on hire and separation dates. The complexity of such requirements is evidenced by one program that targets four subgroups of workers adversely affected by military base closings. The JTPA Defense Diversification Program excludes members of the Armed Forces if they were hired or were not on active duty on or before September 30, 1990; other targeted groups are excluded if they received layoff notices or were terminated before October 1, 1992, or after September 30, 1997. Members of the Armed Forces and Defense employees are excluded for eligibility until they are within 180 days of the separation; civilian employees working at military installations are

[1]Workers with an established work history who have lost their jobs as a result of structural changes in the economy and who are not likely to find new jobs in their former industries or occupations.

excluded from eligibility until they are within 24 months of separation. A second and similar program, the Transition Assistance Program, also restricts access unless the member of the Armed Forces is within 180 days of separation. Until these arbitrary time periods have expired, some workers may be denied access to services needed to provide the necessary training and skills in order to make the transition to new industries and occupations.

A third program, Trade Adjustment Assistance (TAA), focuses on trade-impacted workers and has complex job loss requirements related to the date of separation as well as the level of employment activity during that time. For example, the worker's first qualifying separation must occur after the "impact date" (the date on which layoffs began or threatened to begin), within 2 years of the worker's being certified as adversely affected by imports, and before the termination date of the certification. Further, the worker must have (1) been employed at least 26 of the 52 weeks preceding the last layoff in this trade-affected employment and (2) received wages of $30 or more per week. In our prior report that compared TAA with the Economic Dislocation and Worker Adjustment Assistance (EDWAA) program, state officials said that such complex regulations contribute to the lack of coordination between the two programs. An important indicator of this lack of coordination is that only 10 percent of all TAA participants received EDWAA services during fiscal year 1990.[2]

[2]Dislocated Workers: Comparison of Assistance Programs (GAO/HRD-92-153BR, Sept. 1992).

Program Annual Operating Cycles

Coordination of services is also hampered by differences in program operating cycles within each of the four target groups. According to one administrator, these barriers result in "program coordination becoming...an art," particularly in view of additional state and local operating time frames superimposed on the differing program operating cycles. For these reasons, state officials contacted were in agreement that a standard operating year would greatly facilitate program coordination.

As shown in table VII.1, the 38 programs we reviewed operated on four different annual cycles. Some programs completed their planning process and began operation on January 1, while others did not complete planning and begin operation until October 1. Most programs (20) operated on the basis of a program year (July 1-June 30); 12 programs operated on the federal fiscal year (October 1-September 30); 4 programs operated on an academic year (September 1-August 31); and 2 programs operated on a calendar year (January 1-December 31). These operating cycles varied within each target group regardless of administering agency. For example, two programs previously discussed that target dislocated workers are both administered by the Department of Labor (see appendix VI). However, the TAA program operates on a fiscal-year basis while the EDWAA program operates on a program-year basis.

Administrators attempting to coordinate programs through joint planning have difficulty when operating cycles do not match. One administrator told us that his state operates on a September-to-August time frame, while the JOBS program operates on the federal fiscal year (October 1 to September 30) and JTPA operates on a program year (July 1 to June 30). Although administrators strive to coordinate the programs through joint planning, it is difficult, without parallel operating cycles, to match up available funding with estimates of clients that may need assistance. To accomplish joint planning, the state must resort to several circuitous strategies. Among other things, some agencies involved "lowball," that is, only commit resources they know will be available, and contribute additional resources, as available, at a later time. Other agencies make commitments contingent on expected funding so they are not held to prior commitments when their funding "falls through."

Another state administrator commented that although coordination is hampered by many service delivery barriers, such as conflicting eligibility requirements, other barriers, such as differing operating cycles, pertain to the process or "mechanics" of administering programs. Accordingly, in his view, establishing a standard operating year would be "the key to start the

car"— the impetus needed to begin collaborative planning leading to successful coordination.

Table VII.1: Programs Within Four Target Groups Differ in Definition of Annual Operating Cycle

	Annual operating cycles			
Target group/program	**Jan. 1-Dec. 31**	**July 1-June 30**	**Sept. 1-Aug. 31**	**Oct. 1-Sept. 30**
Older Workers				
Senior Community Service Employment Program		X		
JTPA IIA Training Programs for Older Individuals		X		
Foster Grandparent Program				X
Senior Companion Program				X
Dislocated Workers				
JTPA EDWAA-Dislocated Workers (Local SDA Allotment)		X		
JTPA EDWAA-Dislocated Workers (Governor's 50% Discretionary)		X		
JTPA EDWAA-Dislocated Workers (Secretary's 20% Discretionary)		X		
JTPA Defense Conversion Adjustment		X		
JTPA Clean Air Employment Transition Assistance		X		
JTPA Defense Diversification		X		
Trade Adjustment Assistance-Workers				X
Vocational Education-Demonstration Centers for the Retraining of Dislocated Workers		X		
Transition Assistance Program				X
Economically Disadvantaged				
JTPA IIA Training Services for the Disadvantaged-Adult		X		
JTPA IIA State Education Programs		X		
JTPA IIA Incentive Grants		X		
Job Opportunities and Basic Skills Training				X
Food Stamp Employment and Training				X
Family Self-Sufficiency Program				X
Vocational Education-Basic State Programs		X		
Educational Opportunity Centers			X	
Student Literacy Corps			X	
Youth				
JTPA IIC Disadvantaged Youth		X		
JTPA IIC Disadvantaged Youth-Incentive Grants		X		
JTPA IIC Disadvantaged Youth-State Education Programs		X		
JTPA IIB Training Services for the Disadvantaged-Summer Youth Employment and Training Program (Regular)	X			

(continued)

Target group/program	Annual operating cycles			
	Jan. 1-Dec. 31	July 1-June 30	Sept. 1-Aug. 31	Oct. 1-Sept. 30
JTPA IIB Summer Youth Employment and Training Program (Native American)	X			
JTPA Job Corps		X		
Youth Fair Chance		X		
Transitional Living for Runaway and Homeless Youth				X
Independent Living				X
School Dropout Demonstration Assistance				X
Vocational Education-Community Based Organizations		X		
Upward Bound			X	
Talent Search			X	
School to Work		X		
Federal Employment for Disadvantaged Youth-Summer				X
Youthbuild				X

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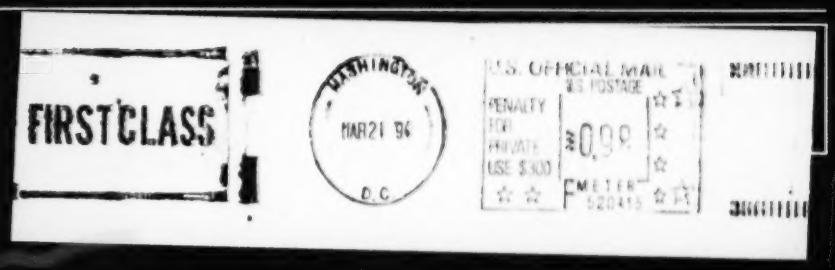

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